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Attorneys for Plaintiff,  
DONNA CORBELLO

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DONNA CORBELLO, an individual,

Plaintiff,

vs.

THOMAS GAETANO DEVITO, an  
individual, *et al.*,

Defendants.

Case No. 2:08-cv-00867-RCJ-PAL

**UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME FOR  
PLAINTIFF'S REPLY IN SUPPORT  
OF MOTION FOR  
RECONSIDERATION**

**(Second Request)**

<sup>1</sup> Mr. McKirgan's firm name and email address have changed effective January 1, 2016. A notice of name change will be filed shortly.

1 Plaintiff Donna Corbello, by her attorneys, and pursuant to LR 6-1 and 7-2, herewith  
2 requests an extension of time in which to file her *Reply* to the New Defendants' *Opposition* to  
3 Plaintiff's *Motion for Reconsideration*. Plaintiff's *Reply* is currently due on January 6, 2016.  
4 Plaintiff seeks a minor reprieve from the current deadline, through January 12, 2016, and  
5 represents that this will be her final such request. Counsel for New Defendants have indicated  
6 that New Defendants do not oppose this motion.

7 Plaintiff filed her *Motion for Reconsideration* (Doc. 876) on October 28, 2015. At New  
8 Defendants' request, Plaintiff stipulated to extending the due date for Defendants' *Opposition* to  
9 the *Motion for Reconsideration* to November 30, 2015, with a corresponding extension for  
10 Plaintiff's *Reply*. (Doc. 878.) At New Defendants' request, Plaintiff also agreed and stipulated  
11 to a second extension of time for their *Opposition*, through December 4, 2015, with a  
12 corresponding extension for Plaintiff's *Reply*, through December 30, 2016. (Doc. 879.) The  
13 Court granted both stipulations, extending the briefing schedule. (Docs. 880 and 881.) New  
14 Defendants then filed the *Opposition* (Doc. 882) by the extended deadline. Defendant DeVito  
15 did not file a response or opposition.

16 Subsequently, at Plaintiffs request, Plaintiff and New Defendants stipulated to extend the  
17 deadline for Plaintiff's *Reply* through January 6, 2016 (Doc. 884) and the Court granted that  
18 stipulation. (Doc. 885.)

19 By this *Motion*, Plaintiff seeks six more days to file her *Reply*. Counsel for New  
20 Defendants has indicated that they do not oppose this *Motion* so long as Plaintiff represents that  
21 she will not seek further extensions, which Plaintiff has done.

22 Plaintiff submits that good cause exists for the grant of the requested extension, beyond  
23 the fact of Defendants' non-opposition thereto. First, the holiday season impacted the amount of  
24 time counsel could work on the *Reply* given family and travel commitments. Second, following  
25 the holidays, Mr. Guillot had to deal with two client emergencies in other matters. Finally, Mr.  
26 McKirgan, who is a member of his firm's executive committee, is in committee meetings much  
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1 of this week relating to his firm's recent merger and compensation-setting. And, again, New  
2 Defendants do not oppose this request.

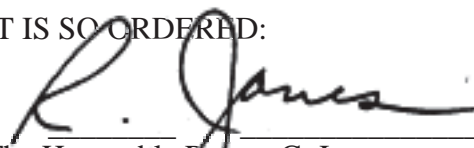
3 IN VIEW OF THE ABOVE, Plaintiff respectfully requests entry of the attached *Order*,  
4 indicating that she may file and serve her Reply to Doc. 882 on or before January 12, 2016.

5 RESPECTFULLY SUBMITTED:

6  
7 By: /s/Gregory H. Guillot  
8 Gregory H. Guillot  
9 Robert H. McKirgan  
10 Randall S. Papetti  
11 Lawrence Kasten  
12 J. Christopher Jorgensen

*Attorneys for Plaintiff, Donna Corbello*

13 IT IS SO ORDERED:

14   
15 The Honorable Robert C. Jones  
16 UNITED STATES DISTRICT JUDGE  
17 Dated: January 6, 2016.  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I certify that on January 6, 2016, I electronically filed the foregoing document and this certificate of service with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/Gregory H. Guillot  
\_\_\_\_\_  
Gregory H. Guillot